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February 19, 2025

Via ECF

Hon. Edgardo Ramos
United States District Court for the Southern
District of New York
40 Foley Square
New York, New York 10007

Re: *Smith et al. v. Scavino*, 1:24-mc-00566-ER (S.D.N.Y.)

Dear Judge Ramos,

We write on behalf of Movants in the above-captioned matter to enforce a non-party subpoena *duces tecum* (“the Subpoena”) to Respondent Daniel Scavino Jr. On February 5, 2025, Movants requested a two-week adjournment of the pre-motion conference originally scheduled for February 6, 2025 in light of Mr. Scavino’s counsel’s agreement to produce documents by February 20, 2025. *See* ECF No. 13. The Court granted this request and adjourned the pre-motion conference until February 20, 2025. *See* ECF No. 14.

Yesterday, February 18, 2025, Mr. Scavino’s counsel informed Movants that Mr. Scavino will be producing documents today, February 19, 2025. The parties agreed to request a three-week extension on tomorrow’s pre-motion conference to March 13, 2025 so that Movants can review the production and the parties can attempt to resolve any outstanding issues. *See* Ex. A.

Accordingly, Movants respectfully request that the Court adjourn the February 20, 2025 pre-motion conference for three weeks until March 13, 2025, or another date at the Court’s convenience, to allow Movants time to review and assess the sufficiency of Mr. Scavino’s production. Mr. Scavino joins in this request.

Sincerely,

The Hon. Edgardo Ramos
February 19, 2025

A handwritten signature in blue ink, appearing to read 'J. Margolin', with a stylized flourish at the end.

Joshua S. Margolin
Partner

Cc: Jeremy Schulman, Jeffrey Gavenman